

The Law Office of Ryan Lozar, P.C.
305 Broadway, 10th Floor, New York, NY 10007
Tel: (310) 867-1562; Alternate Tel: (646) 666-8262; Fax (877) 666-4456
ryanlozar@gmail.com
www.ryanlozar.com/www.luchaportusderechos.com



AUGUST 8, 2016

The Honorable Ramon E. Reyes
United States District Court for the Eastern District of New York Shira Siskind, Esq.

Re: Anthony, et al. v. City of N.Y., et al., No. 15 Civ. 6364 (PKC) (RER)

Dear Judge Reyes:

I represent Plaintiffs in the above-captioned Section 1983 litigation. I write to provide the Court with the Parties' proposed amended pretrial schedule to account for the changes discussed during the August 4, 2016, conference.

- On or before August 12, 2016, Plaintiffs will share their proposed amended complaint with Defendants.
- On or before August 17, 2016, Plaintiffs will file a letter with the Court on the docket with the proposed amended complaint attached as an exhibit. In the letter, Plaintiffs will inform the Court of Defendants' position with respect to the filing.
- On or before August 22, 2016, Defendants will serve all outstanding document discovery upon Plaintiffs, with the possible exception of disciplinary files to the extent that those records experience a delay beyond Defense counsel's control. At present the Parties have no outstanding discovery disputes threatening to cause disagreement on the occasion of the August 22, 2016 production.
- On September 1, 2016, and September 2, 2016, Plaintiffs will take the depositions of the Defendant Officers. In the event that Defendants cannot produce disciplinary files by August 22, 2016, they will make effort to produce them by September 1, 2016.

Finally, the Parties will continue to engage in settlement conference in the hope that this pretrial schedule will be mooted. If we succeed in that effort, we will immediately file a letter notifying the Court.

Thank you,

A handwritten signature in blue ink that reads "Ryan Lozar".

Ryan Lozar